

(4) scheduling a hearing, and certain deadlines related thereto, on final approval of the Settlement, proposed Plan of Allocation, and Lead Counsel's motion for an award of attorneys' fees and Litigation Expenses.

The specific terms of the proposed Settlement are set forth in the Stipulation and Agreement of Settlement (the "Stipulation"), attached as Exhibit 1 to the accompanying Declaration of Jeremy A. Lieberman.

Lead Plaintiffs believe this Motion is unopposed. For the Court's convenience, the Parties' agreed-upon form of proposed Preliminary Approval Order (and accompanying exhibits) is submitted herewith as Exhibit A to the Stipulation. Because the Motion is unopposed, and because, pursuant to Fed. R. Civ. P. 23(e) a hearing for consideration of final approval of the Settlement must later be held after notice of the Settlement is given to the Settlement Class, Lead Plaintiffs respectfully request that the Motion be expeditiously submitted without oral argument. Defendants do not object to having the instant Motion submitted without oral argument.

DATED: December 9, 2021

By: /s/ Steven J. Toll

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CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2021 I caused the foregoing to be electronically filed with the Clerk of Court via CM/ECF, which will send a notice of electronic filing to all registered users.

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